

## **EXHIBIT A**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

MATERIAL SCIENCES CORPORATION,	)	CASE NO.: 1:19-cv-1738
	)	
Plaintiff,	)	JUDGE DONALD C. NUGENT
	)	
v.	)	
	)	
AMERICAN ROLL FORMED PRODUCTS	)	<b><u>DEFENDANT AMERICAN ROLL</u></b>
CORP.,	)	<b><u>FORMED PRODUCTS CORP.'S</u></b>
	)	<b><u>OBJECTIONS AND ANSWERS TO</u></b>
Defendant.	)	<b><u>PLAINTIFF MATERIAL SCIENCES</u></b>
	)	<b><u>CORPORATION'S FIRST SET OF</u></b>
	)	<b><u>REQUESTS FOR ADMISSION</u></b>

Defendant American Roll Formed Products Corp. ("Defendant"), by and through counsel, for its objections and answers to the First Set of Requests for Admission ("Discovery Requests") propounded by Plaintiff Material Sciences Corporation ("Plaintiff"), responds as follows:

**GENERAL OBJECTIONS**

Defendant objects generally to the Discovery Requests on the following grounds, each of which is incorporated by reference in the responses to the individual requests below. All responses set forth herein are subject to and without waiver of any of these General Objections:

1. Defendant objects to the Discovery Requests to the extent they seek information that is neither relevant nor material to the subject matter of this action, nor reasonably calculated to lead to the discovery of admissible evidence.

2. Defendant objects to the Discovery Requests to the extent they purport to impose obligations greater than those imposed by the Federal Rules of Civil Procedure. In responding to the Discovery Requests, Defendant will comply with the requirements set forth by the Federal

Rules of Civil Procedure, but will not comply with any instructions that seek to impose further requirements.

3. Defendant objects to the Discovery Requests to the extent that they call for disclosure of confidential information.

4. Defendant objects to the Discovery Requests to the extent that they seek identification of documents not in Defendant's possession, custody, or control.

5. Defendant objects to the Discovery Requests to the extent they are overly broad in scope and/or unduly burdensome.

6. Defendant objects to the Discovery Requests to the extent they are vague, indefinite, unintelligible or otherwise unanswerable due to ambiguity.

7. Defendant objects to the Discovery Requests to the extent they are unreasonably duplicative of other requests, instructions, or definitions, and/or to the extent they seek information that is equally available to Plaintiff because it is already in Plaintiff's possession or is readily accessible to Plaintiff.

8. Defendant objects to the Discovery Requests to the extent they call for the disclosure of information that is protected by the attorney-client privilege, the attorney work product doctrine, or is otherwise privileged or immune from discovery. This objection includes, but is not limited to, information that Plaintiff seeks regarding communications between Defendant and its attorneys made during or in anticipation of litigation. Inadvertent disclosure of information governed by such privileges is not a waiver of those privileges either as to the information produced or as to any other information.

9. In providing these responses to the Discovery Requests, Defendant does not in any way waive or intend to waive, but rather intends to preserve:

a. All objections as to the competency, relevancy, materiality and admissibility of any of the Discovery Requests, the responses and their subject matter;

b. All objections as to the vagueness, ambiguity or other infirmity in the form of any of the Discovery Requests, and any objections based on the undue burden imposed thereby;

c. All rights to object on any ground to the use of any of the responses, or its subject matter, in any subsequent proceedings, including the trial of this or any other action;

d. All rights to object on any ground to any other discovery requests involving or related to the subject matter of the Discovery Requests;

e. The right to supplement responses to the Discovery Requests prior to trial; and

f. Any and all privileges and/or rights under the applicable Federal Rules of Civil Procedure, the Local Rules of this Court or other statutes or common law.

10. To the extent that Defendant provides information or documents in response to these Discovery Requests, which production shall not constitute a waiver of any objection to the relevancy of such information, all such objections being expressly reserved, Defendant also expressly reserves the right to object to further discovery to the subject matter of the Discovery Requests, and to the introduction of any response to the Discovery Requests or any portion thereof, or any document produced as a result of the Discovery Requests into evidence in this or any other action.

These General Objections are incorporated by this reference into each and every response to the Discovery Requests herein.

**REQUEST FOR ADMISSION**

**REQUEST FOR ADMISSION 1:** The copies of the January 5, 2018, February 9, 2018, February 20, 2018, and March 8, 2018 purchase orders attached hereto as Exhibit 1 are true, accurate, and authentic copies of your Purchase Order Numbers (a) PO000079; (b) PO000133; (c) PO000149; (d) PO000150; (e) PO000152; and (f) PO000182.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 2:** On January 5, 2018, American Roll ordered rolled steel from MSC by submitting Purchase Order Number PO000079.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 3:** On February 9, 2018, American Roll ordered rolled steel from MSC by submitting Purchase Order Number PO000133.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving



rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 4:** On February 20, 2018, American Roll ordered rolled steel from MSC by submitting Purchase Order Number PO000149.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 5:** On February 20, 2018, American Roll ordered rolled steel from MSC by submitting Purchase Order Number PO000150.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 6:** On February 20, 2018, American Roll ordered rolled steel from MSC by submitting Purchase Order Number PO000152.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 7:** On March 8, 2018, American Roll ordered rolled steel from MSC by submitting Purchase Order Number PO000182.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 8:** You received the goods described in Purchase Order Number PO000079.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 9:** You received the goods described in Purchase Order Number PO000133.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 10:** You received the goods described in Purchase Order Number PO000149.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 11:** You received the goods described in Purchase Order Number PO000150.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 12:** You received the goods described in Purchase Order Number PO000152.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.



**REQUEST FOR ADMISSION 13:** You received the goods described in Purchase Order Number PO000182.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 14:** The copies of the invoices attached hereto as Exhibit 2 are true, accurate, and authentic copies of (a) Invoice # 51240, (b) Invoice # 51581, (c) Invoice # 51716, (d) Invoice # 51901, and (e) Invoice # 52244 received by you in conjunction with the goods referenced therein.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 15:** The goods described in Invoice # 51240 are the goods ordered in Purchase Order Numbers PO000079 and PO000152.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 16:** The goods described in Invoice # 51581 are the goods ordered in Purchase Order Number PO000133.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 17:** The goods described in Invoice # 51716 are the goods ordered in Purchase Order Number PO000149.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 18:** The goods described in Invoice # 51901 are the goods ordered in Purchase Order Number PO000150.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 19:** The goods described in Invoice # 52244 are the goods ordered in Purchase Order Number PO000182.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 20:**

You accepted the goods described in Purchase Order Numbers PO000079 and PO000152 and Invoice # 51240.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 21:** You accepted the goods described in Purchase Order Number PO000133 and Invoice # 51581.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 22:** You accepted the goods described in Purchase Order Number PO000149 and Invoice # 51716.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 23:** You accepted the goods described in Purchase Order Number PO000150 and Invoice # 51901.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 24:** You accepted the goods described in Purchase Order Number PO000182 and Invoice # 52244.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 25:** There were no defects with the goods set out in Invoice # 51240 and Purchase Order Numbers PO000079 and PO000152.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 26:** There are or were no defects with the goods set out in Invoice # 51581 and Purchase Order Number PO000133.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 27:** There were no defects with the goods set out in Invoice # 51716 and Purchase Order Number PO000149.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.



**REQUEST FOR ADMISSION 28:** There were no defects with the goods set out in Invoice # 51901 and Purchase Order Number PO000150.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 29:** There were no defects with the goods set out in Invoice # 52244 and Purchase Order Number PO000182.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 30:** You used the goods set out in Invoice # 51240 and Purchase Order Numbers PO000079 and PO000152 in products that you sold to third-parties.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 31:** You used the goods set out in Invoice # 51581 and Purchase Order Number PO000133 in products that you sold to third-parties.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 32:** You used the goods set out in Invoice # 51716 and Purchase Order Number PO000149 in products that you sold to third-parties.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 33:** You used the goods set out in Invoice # 51901 and Purchase Order Number PO000150 in products that you sold to third-parties.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 34:** You used the goods set out in Invoice # 52244 and Purchase Order Number PO000182 in products that you sold to third-parties.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 35:** You owe the amount due on Invoice # 51240.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 36:** You owe the amount due on Invoice # 51581.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 37:** You owe the amount due on Invoice # 51716.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving

rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 38:** You owe the amount due on Invoice # 51901.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

**REQUEST FOR ADMISSION 39:** You owe the amount due on Invoice # 52244.

**ANSWER:** Based upon the information currently available, Defendant admits this Request for Admission. Further answering, Defendant continues to investigate the facts giving rise to the claims and defenses in this action and reserves the right to revise, modify, or supplement this Answer as discovery proceeds.

As to Objections,

/s/ Richard W. Cline  
RICHARD W. CLINE (0068560)  
JOSEPH M. MUSKA (0089512)  
McDonald Hopkins LLC  
600 Superior Avenue, East, Suite 2100  
Cleveland, OH 44114  
Telephone: (216) 348-5400  
Facsimile: (216) 348-5474  
E-mail: [rcline@mcdonalddhopkins.com](mailto:rcline@mcdonalddhopkins.com)  
[jmuska@mcdonalddhopkins.com](mailto:jmuska@mcdonalddhopkins.com)

*Attorneys for Defendant  
American Roll Formed Products Corp.*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 18, 2019, the foregoing **Defendant American Roll Formed Products Corp.'s Objections and Responses to Plaintiff Material Sciences Corporation's First Set of Requests for Admission** was served by email upon the following:

Daniel R. Swetnam, Esq.  
Kristina Dahmann, Esq.  
ICE MILLER LLP  
250 West Street, Suite 700  
Columbus, OH 43215  
Email: [Daniel.Swetnam@icemiller.com](mailto:Daniel.Swetnam@icemiller.com)  
Email: [Kristina.Dahmann@icemiller.com](mailto:Kristina.Dahmann@icemiller.com)  
*Counsel for Plaintiff*  
*Material Sciences Corporation*

/s/ Richard W. Cline  
RICHARD W. CLINE (0068560)  
JOSEPH M. MUSKA (0089512)  
McDonald Hopkins LLC  
*Attorneys for Defendant*  
*American Roll Formed Products Corp.*



## **EXHIBIT 1**

## American Roll Form

141 W Walnut Avenue  
Painesville, OH 44077  
Phone: 440-709-9057

## Purchase Order

Date Jan 05, 2018	Page 1
Purchase Order Number PO000079	

Vendor Address: MAT1697

Ship To:

MATERIAL SCIENCES CORP.  
PO BOX 310625  
DES MOINES, IA 50331-0625  
USA

Hynes Industries Roll Formed Products / Painesville, OH  
141 W. Walnut Avenue  
Painesville, OH 44077

Reference	Expected Arrival	PO Date	F.O.B.	Terms	Ship Via
	Mar 12, 2017	Jan 05, 2018		3/4 % 10 Net 30	
Qty	Item #	Description	Unit Cost	UOM	Extended Price
120,000	MASTER COIL PP	Master Coil of PP Material MASTER COIL PREPAINTED *SLIT* COIL TO SIZES AS NEEDED  STEELCRAFT GLAZING BEAD BEIGE/BEIGE	0.747500	LB	89,700.00

Total Purchase Order

89,700.00

Shipping documents & Invoice must reference the Purchase Order #.  
Invoices should be sent to AP@hynesind.com  
Certifications should be sent with all material purchases as appropriate.  
\*\*\* Trucks will be delayed or refused without this necessary information \*\*\*

American Roll Form

## Purchase Order

141 W Walnut Avenue  
Painesville, OH 44077  
Phone: 440-709-9057

Date Feb 09, 2018	Page 1
Purchase Order Number PO000133	

Vendor Address: MAT1697

Ship To:

MATERIAL SCIENCES CORP.  
PO BOX 310625  
DES MOINES, IA 50331-0625  
USA

Hynes Industries Roll Formed Products / Painesville, OH  
141 W. Walnut Avenue  
Painesville, OH 44077

Reference	Expected Arrival	PO Date	F.O.B.	Terms	Ship Via
	Apr 16, 2018	Feb 09, 2018	DELIVERED	3/4 % 10 Net 30	

Qty	Item #	Description	Unit Cost	UOM	Extended Price
45,000	MASTER COIL PP	Master Coil of PP Material MASTER COIL PREPAINTED SLIT COIL TO SIZES AS NEED  MULTILINK CMM RED/WHITE	0.997500	LB	44,887.50

Total Purchase Order

44,887.50

Shipping documents &amp; Invoice must reference the Purchase Order #.

Invoices should be sent to AP@hynesind.com

Certifications should be sent with all material purchases as appropriate.

\*\*\* Trucks will be delayed or refused without this necessary information \*\*\*

Date Feb 20, 2018	Page 1
Purchase Order Number PO000149	

Vendor Address: MAT1697

MATERIAL SCIENCES CORP.  
PO BOX 310625  
DES MOINES, IA 50331-0625  
USA

Ship To:

Hynes Industries Roll Formed Products / Painesville, OH  
141 W. Walnut Avenue  
Painesville, OH 44077

Reference	Expected Arrival	PO Date	F.O.B.	Terms	Ship Via
	Mar 19, 2018	Feb 20, 2018	DELIVERED	3/4 % 10 Net 30	
Qty	Item #	Description	Unit Cost	UOM	Extended Price
120,000	MASTER COIL GV	Master Coil of GV Material SLIT COIL TO SIZES AS NEEDED MULTILINK MBL BARE SLIT WILL ACCEPT UP TO 45K  <i>PO 128 1/30/18 160,000, 500</i>	0.622500	LB	74,700.00

Total Purchase Order

74,700.00

Shipping documents & Invoice must reference the Purchase Order #.  
Invoices should be sent to AP@hynesind.com

Certifications should be sent with all material purchases as appropriate.

\*\*\* Trucks will be delayed or refused without this necessary information \*\*\*

## American Roll Form

141 W. Walnut Avenue  
Painesville, OH 44077  
Phone: 440-709-9057

## Purchase Order

Date Feb 20, 2018	Page 1
Purchase Order Number PO000150	

Vendor Address: MAT1697

Ship To:

MATERIAL SCIENCES CORP.  
PO BOX 310625  
DES MOINES, IA 50331-0625  
USA

Hynes Industries Roll Formed Products / Painesville, OH  
141 W. Walnut Avenue  
Painesville, OH 44077

Reference	Expected Arrival	PO Date	F.O.B.	Terms	Ship Via
	Apr 16, 2018	Feb 20, 2018	DELIVERED	3/4 % 10 Net 30	
Qty	Item #	Description	Unit Cost	UOM	Extended Price
90,000	MASTER COIL PP	Master Coil of PP Material SLIT COIL TO SIZES AS NEEDED MULTILINK CMM BROWN/ALMOND	0.980000	LB	88,200.00

Total Purchase Order

88,200.00

Shipping documents &amp; Invoice must reference the Purchase Order #.

Invoices should be sent to AP@hynesind.com

Certifications should be sent with all material purchases as appropriate.

\*\*\* Trucks will be delayed or refused without this necessary information \*\*\*



## American Roll Form

141 W Walnut Avenue  
Painesville, OH 44077  
Phone: 440-709-9057

## Purchase Order

Date Feb 20, 2018	Page 1
Purchase Order Number PO000152	

Vendor Address: MAT1697

MATERIAL SCIENCES CORP.  
P.O. BOX 310625  
DES MOINES, IA 50331-0625  
USA

Ship To:

Hynes Industries Roll Formed Products / Painesville, OH  
141 W. Walnut Avenue  
Painesville, OH 44077

Reference	Expected Arrival	PO Date	F.O.B.	Terms	Ship Via
	Apr 23, 2018	Feb 20, 2018	DELIVERED	3/4 % 10 Net 30	

Qty	Item #	Description	Unit Cost	UOM	Extended Price
45,000	PGVC02403054	0.022-0.026 x 3.054 GV CS-B G60 Material painted Valspar Ber STEELCRAFT TOP CAP MATERIAL PAINTED VALSPAR BEIGE- 2569E-10002/BEIGE- 2569E-10002	0.910000	LB	40,950.00

Total Purchase Order

40,950.00

Shipping documents & Invoice must reference the Purchase Order #.  
Invoices should be sent to AP@hynesind.com  
Certifications should be sent with all material purchases as appropriate.  
\*\*\* Trucks will be delayed or refused without this necessary information \*\*\*

141 W Walnut Avenue  
Painesville, OH 44077  
Phone: 440-709-9057

Mar 08, 2018

Page  
1

Purchase Order Number  
PO000182

Vendor Address: MAT1697

Ship To:

MATERIAL SCIENCES CORP.  
PO BOX 310625  
DES MOINES, IA 50331-0625  
USA

Hynes Industries Roll Formed Products / Painesville, OH  
141 W. Walnut Avenue  
Painesville, OH 44077

Reference	Expected Arrival	PO Date	F.O.B.	Terms	Ship Via
	May 07, 2018	Mar 08, 2018		3/4 % 10 Net 30	

Qty	Item #	Description	Unit Cost	UOM	Extended Price
90,000	MASTER COIL PP	Master Coil of PP Material MASTER COIL PREPAINTED SLIT COIL TO SIZES AS NEEDED  MULTILINK CMM BROWN/RED	1.062500	LB	95,625.00

Total Purchase Order

95,625.00

Shipping documents &amp; Invoice must reference the Purchase Order #.

Invoices should be sent to AP@hynesind.com

Certifications should be sent with all material purchases as appropriate.

\*\*\* Trucks will be delayed or refused without this necessary information \*\*\*

**EXHIBIT 2**

**MSC** Material Sciences Corporation**Elk Grove Village**2250 Pratt Blvd  
Elk Grove Village, IL 60007  
Phone: 847-439-9800 Fax:Invoice # 51240  
Invoice Date: 5/16/18Remit to: Material Sciences Corporation  
PO Box 310625  
Des Moines, IA 50331-0625Sold To:  
American Roll Form Products  
c/o Hynes Industries  
141 W. Walnut Ave  
Painesville OH 44077Ship To:  
American Roll Form Products Co  
141 West Walnut St.  
Painesville OH 44077  
USA

Freight DEL	Terms ***COD***	Shipper # 148285	Shipped 05/16/18	Invoiced 05/16/18	DUE ON OR BEFORE 06/15/18
Wgt	Type	Description	Qty	Price	Amount

27232	GHP	0.0220Min x 3.0540 x Coil HDG CSB G40 NCT LO Beige/Beige	CWT	91.0000	24781.12
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Customer PO# : 152  
Part Number : PGVC02403054  
Sales Order : 38826-1 (9347)

Tag	Weight	Pcs	Ref #
8718802	1702	1	47734-P101
8718803	1702	1	47734-P102
8718804	1702	1	47734-P103
8718805	1702	1	47734-P104
8718806	1702	1	47734-P105
8718807	1702	1	47734-P106
8718808	1702	1	47734-P107
8718809	1702	1	47734-P108
8718810	1702	1	47734-P109
8718811	1702	1	47734-P110
8718812	1702	1	47734-P111
8718813	1702	1	47734-P112
8718814	1702	1	47734-P113
8718815	1702	1	47734-P114
8718816	1702	1	47734-P115
8718817	1702	1	47734-P116

JT

\*\*\* Continued \*\*\*

Page 1

This invoice is governed by Material Sciences Corporation's standard Terms and Conditions of Sale, which is hereby incorporated by reference. The Terms and Conditions of Sale can be found online at <https://www.materialsciencescorp.com/resources>.  
We hereby certify that these goods were produced in compliance with all applicable requirements of Section 6, 7, and 12 of the Fair Labor Standards Act as amended, and of the regulations and orders of the United States Department of Labor issued under Section 14 thereof.



# Material Sciences Corporation

## Elk Grove Village

2250 Pratt Blvd  
Elk Grove Village, IL 60007  
Phone: 847-439-9800 Fax:

Invoice # 51240  
Invoice Date: 5/16/18

Remit to: Material Sciences Corporation  
PO Box 310625  
Des Moines, IA 50331-0625

Sold To:  
American Roll Form Products  
c/o Hynes Industries  
141 W. Walnut Ave  
Painesville OH 44077

Ship To:  
American Roll Form Products Co  
141 West Walnut St.  
Painesville OH 44077  
USA

Freight DEL	Terms ***COD***	Shipper # 148285	Shipped 05/16/18	Invoiced 05/16/18	DUE ON OR BEFORE 06/15/18
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Wgt	Type	Description	Qty	Price	Amount
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12873	GHP	0.0420Min x 1.6930 x Coil HDG CSB G40 NCT LO Beige/Beige	CWT	74.7500	9622.57
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Customer PO# : 79  
Part Number : .042 X 1.693  
Sales Order : 39660-1 (9239)

Tag	Weight	Pcs	Ref #
8494638	613	1	45767-P236
8494639	613	1	45767-P237
8494640	613	1	45767-P238
8494641	613	1	45767-P239
8494642	613	1	45767-P240
8494643	613	1	45767-P241
8494644	613	1	45767-P242
8494645	613	1	45767-P243
8494646	613	1	45767-P244
8494647	613	1	45767-P245
8494648	613	1	45767-P246
8494649	613	1	45767-P247
8494650	613	1	45767-P248
8494651	613	1	45767-P249
8494652	613	1	45767-P250
8494653	613	1	45767-P251
8494654	613	1	45767-P252
8494655	613	1	45767-P253
8494656	613	1	45767-P254
8494657	613	1	45767-P255
8494658	613	1	45767-P256

JT

\*\*\* Continued \*\*\*

Page 2

This invoice is governed by Material Sciences Corporation's standard Terms and Conditions of Sale, which is hereby incorporated by reference. The Terms and Conditions of Sale can be found online at <https://www.materialsciencescorp.com/resources>.  
We hereby certify that these goods were produced in compliance with all applicable requirements of Section 6,7, and 12 of the Fair Labor Standards Act as amended, and of the regulations and orders of the United States Department of Labor issued under Section 14 thereof.



**MSC** Material Sciences Corporation**Elk Grove Village**

2250 Pratt Blvd  
 Elk Grove Village, IL 60007  
 Phone: 847-439-9800 Fax:

Invoice # 51240  
 Invoice Date: 5/16/18

Remit to: Material Sciences Corporation  
 PO Box 310625  
 Des Moines, IA 50331-0625

Sold To:  
 American Roll Form Products  
 c/o Hynes Industries  
 141 W. Walnut Ave  
 Painesville OH 44077

Ship To:  
 American Roll Form Products Co  
 141 West Walnut St.  
 Painesville OH 44077  
 USA

Freight DEL	Terms ***COD***	Shipper # 148285	Shipped 05/16/18	Invoiced 05/16/18	DUE ON OR BEFORE 06/15/18
Wgt	Type	Description	Qty	Price	Amount

Total Invoice: \$ 34403.69

JT

\*\*\* End \*\*\*

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# Elk Grove Village

2250 Pratt Blvd  
Elk Grove Village, IL 60007  
Phone: 847-439-9800 Fax:

Invoice # 51581  
Invoice Date: 5/31/18

Remit to: Material Sciences Corporation  
PO Box 310625  
Des Moines, IA 50331-0625

Sold To:  
American Roll Form Products  
c/o Hynes Industries  
141 W. Walnut Ave  
Painesville OH 44077

Ship To:  
American Roll Form Products Co  
141 West Walnut St.  
Painesville OH 44077  
USA

Freight DEL	Terms ***COD***	Shipper # 149693	Shipped 05/31/18	Invoiced 05/31/18	DUE ON OR BEFORE 06/30/18
Wgt	Type	Description	Qty	Price	Amount

13052	GHP	0.0210Min x 6.4750 x Coil HDG CSB G40 NCT XS LO-WHITE/RED	CWT	99.7500	13019.37
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Customer PO# : 133  
Part Number : GVPP02106475RW  
Sales Order : 40533-1 (4701)

Tag	Weight	Pcs	Ref #
8726402	1068	1	47818-P101
8717002	1104	1	47766-P101
8726403	1068	1	47818-P102
8717003	1104	1	47766-P102
8726413	1069	1	47818-P112
8717013	1107	1	47766-P112
8726414	1069	1	47818-P113
8717014	1107	1	47766-P113
8726424	1069	1	47818-P123
8717024	1109	1	47766-P123
8726425	1069	1	47818-P124
8717025	1109	1	47766-P124

21275	GHP	0.0210Min x 4.2200 x Coil HDG CSB G40 NCT XS LO-WHITE/RED	CWT	99.7500	21221.81
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Customer PO# : 133  
Part Number : GVPP02104220RW  
Sales Order : 40534-1 (4771)

Tag	Weight	Pcs	Ref #
8726404	696	1	47818-P103
8717004	720	1	47766-P103
8726405	696	1	47818-P104

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**MSC** Material Sciences Corporation**Elk Grove Village**

2250 Pratt Blvd  
Elk Grove Village, IL 60007  
Phone: 847-439-9800 Fax:

Invoice # 51581  
Invoice Date: 5/31/18

Remit to: Material Sciences Corporation  
PO Box 310625  
Des Moines, IA 50331-0625

Sold To:  
American Roll Form Products  
c/o Hynes Industries  
141 W. Walnut Ave  
Painesville OH 44077

Ship To:  
American Roll Form Products Co  
141 West Walnut St.  
Painesville OH 44077  
USA

Freight DEL	Terms ***COD***	Shipper # 149693	Shipped 05/31/18	Invoiced 05/31/18	DUE ON OR BEFORE 06/30/18
Wgt	Type	Description	Qty	Price	Amount

Tag	Weight	Pcs	Ref #
8717005	720	1	47766-P104
8726406	696	1	47818-P105
8717006	720	1	47766-P105
8726407	696	1	47818-P106
8717007	720	1	47766-P106
8726408	696	1	47818-P107
8717008	720	1	47766-P107
8726415	697	1	47818-P114
8717015	722	1	47766-P114
8726416	697	1	47818-P115
8717016	722	1	47766-P115
8726417	697	1	47818-P116
8717017	722	1	47766-P116
8726418	697	1	47818-P117
8717018	722	1	47766-P117
8726419	697	1	47818-P118
8717019	722	1	47766-P118
8726426	697	1	47818-P125
8717026	723	1	47766-P125
8726427	697	1	47818-P126
8717027	723	1	47766-P126
8726428	697	1	47818-P127
8717028	723	1	47766-P127
8726429	697	1	47818-P128
8717029	723	1	47766-P128
8726430	697	1	47818-P129
8717030	723	1	47766-P129

JT

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Page 2

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**MSC** Material Sciences Corporation**Elk Grove Village**2250 Pratt Blvd  
Elk Grove Village, IL 60007  
Phone: 847-439-9800 Fax:Invoice # 51581  
Invoice Date: 5/31/18Remit to: Material Sciences Corporation  
PO Box 310625  
Des Moines, IA 50331-0625Sold To:  
American Roll Form Products  
c/o Hynes Industries  
141 W. Walnut Ave  
Painesville OH 44077Ship To:  
American Roll Form Products Co  
141 West Walnut St.  
Painesville OH 44077  
USA

Freight DEL	Terms ***COD***	Shipper # 149693	Shipped 05/31/18	Invoiced 05/31/18	DUE ON OR BEFORE 06/30/18
Wgt	Type	Description	Qty	Price	Amount

13616	GHP	0.0190Min x 3.3760 x Coil HDG CSB G40 NCT XS LO-WHITE/RED	CWT	99.7500	13581.96
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Customer PO# : 133  
Part Number : GVPP021003376  
Sales Order : 40535-1 (4922)

Tag	Weight	Pcs	Ref #
8726409	557	1	47818-P108
8717009	576	1	47766-P108
8726410	557	1	47818-P109
8717010	576	1	47766-P109
8726411	557	1	47818-P110
8717011	576	1	47766-P110
8726412	557	1	47818-P111
8717012	576	1	47766-P111
8726420	558	1	47818-P119
8717020	577	1	47766-P119
8726421	558	1	47818-P120
8717021	577	1	47766-P120
8726422	558	1	47818-P121
8717022	577	1	47766-P121
8726423	558	1	47818-P122
8717023	577	1	47766-P122
8726431	558	1	47818-P130
8717031	578	1	47766-P130
8726432	558	1	47818-P131
8717032	578	1	47766-P131
8726433	558	1	47818-P132
8717033	578	1	47766-P132
8726434	558	1	47818-P133
8717034	578	1	47766-P133

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Page 3

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**MSC** Material Sciences Corporation**Elk Grove Village**

2250 Pratt Blvd  
 Elk Grove Village, IL 60007  
 Phone: 847-439-9800 Fax:

Invoice # 51581  
 Invoice Date: 5/31/18

Remit to: Material Sciences Corporation PO Box 310625 Des Moines, IA 50331-0625
---

Sold To:  
 American Roll Form Products  
 c/o Hynes Industries  
 141 W. Walnut Ave  
 Painesville OH 44077

Ship To:  
 American Roll Form Products Co  
 141 West Walnut St.  
 Painesville OH 44077  
 USA

Freight DEL	Terms ***COD***	Shipper # 149693	Shipped 05/31/18	Invoiced 05/31/18	DUE ON OR BEFORE 06/30/18
Wgt	Type	Description	Qty	Price	Amount

Total Invoice: \$ 47823.14

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**MSC** Material Sciences Corporation**Elk Grove Village**2250 Pratt Blvd  
Elk Grove Village, IL 60007  
Phone: 847-439-9800 Fax:Invoice # 51716  
Invoice Date: 6/05/18Remit to: Material Sciences Corporation  
PO Box 310625  
Des Moines, IA 50331-0625Sold To:  
American Roll Form Products  
c/o Hynes Industries  
141 W. Walnut Ave  
Painesville OH 44077Ship To:  
American Roll Form Products Co  
141 West Walnut St.  
Painesville OH 44077  
USA

Freight DEL	Terms ***COD***	Shipper #	Shipped	Invoiced	DUE ON OR BEFORE
		51831	06/05/18	06/05/18	07/05/18
Wgt	Type	Description	Qty	Price	Amount

20666	GHP	0.0220Min x 2.4650 x Coil HDG Bare - Slit	CWT	62.2500	12864.59
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Customer PO# : 149  
Part Number : HDC0210002465  
Sales Order : 40536-1 (9386)

Tag	Weight	Pcs	Ref #
897822	1947	3	47018-01
897807	1438	3	47017-01
897815	1469	3	47013-01
897823	1974	3	47018-02
897808	1451	3	47017-02
897816	1486	3	47013-02
897824	1972	3	47018-03
897809	1452	3	47017-03
897817	1495	3	47013-03
897829	1982	3	47018-04
897830	1998	3	47018-05
897831	2002	3	47018-06

13969	GHP	0.0220Min x 3.7600 x Coil HDG Bare - Slit	CWT	62.2500	8695.70
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Customer PO# : 149  
Part Number : HDC0210003760  
Sales Order : 40537-1 (9385)

Tag	Weight	Pcs	Ref #
897812	1474	2	47017-06
897820	1502	2	47013-06
897813	1460	2	47017-07

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**MSC** Material Sciences Corporation**Elk Grove Village**2250 Pratt Blvd  
Elk Grove Village, IL 60007  
Phone: 847-439-9800 Fax:Invoice # 51716  
Invoice Date: 6/05/18Remit to: Material Sciences Corporation  
PO Box 310625  
Des Moines, IA 50331-0625Sold To:  
American Roll Form Products  
c/o Hynes Industries  
141 W. Walnut Ave  
Painesville OH 44077Ship To:  
American Roll Form Products Co  
141 West Walnut St.  
Painesville OH 44077  
USA

Freight DEL	Terms ***COD***	Shipper # 51831	Shipped 06/05/18	Invoiced 06/05/18	DUE ON OR BEFORE 07/05/18
Wgt	Type	Description	Qty	Price	Amount

Tag	Weight	Pcs	Ref #
897821	1488	2	47013-07
897827	2001	2	47018-11
897828	1975	2	47018-12
897834	2049	2	47018-13
897835	2020	2	47018-14

9191	GHP	0.0220Min x 1.6300 x Coil HDG Bare - Slit	CWT	62.2500	5721.40
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Customer PO# : 149  
Part Number : HDC0210001630  
Sales Order : 40538-1 (9387)

Tag	Weight	Pcs	Ref #
897810	968	3	47017-04
897818	987	3	47013-04
897811	964	3	47017-05
897819	987	3	47013-05
897825	1306	3	47018-07
897826	1300	3	47018-08
897832	1343	3	47018-09
897833	1336	3	47018-10

Total Invoice: \$ 27281.69

JT

\*\*\* End \*\*\*

Page 2

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**MSC** Material Sciences Corporation**Elk Grove Village**2250 Pratt Blvd  
Elk Grove Village, IL 60007  
Phone: 847-439-9800 Fax:Invoice # 51901  
Invoice Date: 6/13/18Remit to: Material Sciences Corporation  
PO Box 310625  
Des Moines, IA 50331-0625Sold To:  
American Roll Form Products  
c/o Hynes Industries  
141 W. Walnut Ave  
Painesville OH 44077Ship To:  
American Roll Form Products Co  
141 West Walnut St.  
Painesville OH 44077  
USA

Freight DEL	Terms ***COD***	Shipper # 151034	Shipped 06/13/18	Invoiced 06/13/18	DUE ON OR BEFORE 07/13/18
Wgt	Type	Description	Qty	Price	Amount

35016	GHP	0.0190Min x 4.2200 x Coil HDG Painted CSB G90-Brown/Almond	CWT	98.0000	34315.68
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Customer PO# : 150  
Part Number : .019 X 4.22  
Sales Order : 40769-1 (5463)

Tag	Weight	Pcs	Ref #
8739302	2200	1	47997-P101
8727902	2177	1	47819-P101
8739303	2200	1	47997-P102
8727903	2177	1	47819-P102
8739304	2200	1	47997-P103
8727904	2177	1	47819-P103
8739305	2200	1	47997-P104
8727905	2177	1	47819-P104
8739306	2200	1	47997-P105
8727906	2177	1	47819-P105
8739307	2200	1	47997-P106
8727907	2177	1	47819-P106
8739308	2200	1	47997-P107
8727908	2177	1	47819-P107
8739309	2200	1	47997-P108
8727909	2177	1	47819-P108

JT

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Page 1

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**MSO** Material Sciences Corporation**Elk Grove Village**2250 Pratt Blvd  
Elk Grove Village, IL 60007  
Phone: 847-439-9800 Fax:Invoice # 51901  
Invoice Date: 6/13/18Remit to: Material Sciences Corporation  
PO Box 310625  
Des Moines, IA 50331-0625Sold To:  
American Roll Form Products  
c/o Hynes Industries  
141 W. Walnut Ave  
Painesville OH 44077Ship To:  
American Roll Form Products Co  
141 West Walnut St.  
Painesville OH 44077  
USA

Freight DEL	Terms ***COD***	Shipper # 151034	Shipped 06/13/18	Invoiced 06/13/18	DUE ON OR BEFORE 07/13/18
Wgt	Type	Description	Qty	Price	Amount

13434	GHP	0.0190Min x 6.4750 x Coil HDG CSB G40 NCT XS LO-BROWN/ALMOND	CWT	.98.0000	13165.32
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Customer PO# : 150  
Part Number : .019 X 6.47  
Sales Order : 40771-1 (4943)

Tag	Weight	Pcs	Ref #
8739310	3375	1	47997-P109
8727910	3342	1	47819-P109
8739311	3375	1	47997-P110
8727911	3342	1	47819-P110

Total Invoice: \$ 47481.00

JT

\*\*\* End \*\*\*

Page 2

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**MSC** Material Sciences Corporation**Elk Grove Village**2250 Pratt Blvd  
Elk Grove Village, IL 60007  
Phone: 847-439-9800 Fax:Invoice # 52244  
Invoice Date: 6/27/18Remit to: Material Sciences Corporation  
PO Box 310625  
Des Moines, IA 50331-0625Sold To:  
American Roll Form Products  
c/o Hynes Industries  
141 W. Walnut Ave  
Painesville OH 44077Ship To:  
American Roll Form Products Co  
141 West Walnut St.  
Painesville OH 44077  
USA

Freight DEL	Terms ***COD***	Shipper # 152344	Shipped 06/27/18	Invoiced 06/27/18	DUE ON OR BEFORE 07/27/18
Wgt	Type	Description	Qty	Price	Amount

46998	GHP	0.0210Min x 3.3760 x Coil HDG CSB G90 NCT XS LO-BROWN/Red	CWT	106.2500	49935.38
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Customer PO# : 182  
Part Number : .021 X 3.376 BRN/RED  
Sales Order : 40752-1 (9714)

Tag	Weight	Pcs	Ref #
8907802	1671	1	49081-P101
8907702	1686	1	49080-P101
8907803	1671	1	49081-P102
8907703	1686	1	49080-P102
8907804	1671	1	49081-P103
8907704	1686	1	49080-P103
8907805	1671	1	49081-P104
8907705	1686	1	49080-P104
8907806	1671	1	49081-P105
8907706	1686	1	49080-P105
8907807	1671	1	49081-P106
8907707	1686	1	49080-P106
8907808	1671	1	49081-P107
8907708	1686	1	49080-P107
8907809	1671	1	49081-P108
8907709	1686	1	49080-P108
8907810	1671	1	49081-P109
8907710	1686	1	49080-P109
8907811	1671	1	49081-P110
8907711	1686	1	49080-P110
8907812	1671	1	49081-P111
8907712	1686	1	49080-P111
8907813	1671	1	49081-P112
8907713	1686	1	49080-P112

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**MSC** Material Sciences Corporation**Elk Grove Village**

2250 Pratt Blvd  
 Elk Grove Village, IL 60007  
 Phone: 847-439-9800 Fax:

Invoice # 52244

Invoice Date: 6/27/18

Remit to: Material Sciences Corporation PO Box 310625 Des Moines, IA 50331-0625
---

Sold To:  
 American Roll Form Products  
 c/o Hynes Industries  
 141 W. Walnut Ave  
 Painesville OH 44077

Ship To:  
 American Roll Form Products Co  
 141 West Walnut St.  
 Painesville OH 44077  
 USA

Freight DEL	Terms ***COD***	Shipper # 152344	Shipped 06/27/18	Invoiced 06/27/18	DUE ON OR BEFORE 07/27/18
Wgt	Type	Description	Qty	Price	Amount

Tag	Weight	Pcs	Ref #
8907814	1671	1	49081-P113
8907714	1686	1	49080-P113
8907815	1671	1	49081-P114
8907715	1686	1	49080-P114

Total Invoice: \$ 49935.38

JT

\*\*\* End \*\*\*

Page 2

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